

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KING RANGE, JR.,  
Plaintiff,  
v.  
FLEMINGTON ESTATES LLC and FRANKIE  
SHOP, LLC,  
Defendants.

Civil Action No.  
1:25-cv-02633-MMG

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that, upon the Declaration of Avram E. Frisch dated June 18, 2025, and the exhibits annexed thereto; and upon the accompanying memorandum of law; and upon all the pleadings and prior proceedings had herein, Defendant Flemington Estates LLC (the “Landlord Defendant”) will move this Court, before the Honorable Margaret M. Garnett, at the United States District Court, Southern District of New York, 40 Foley Square, Courtroom 906, New York, NY 10007, for an order:

- (a) Dismissing the Complaint as against the Landlord Defendant; and
- (b) Granting as such other and further relief as the Court deems just and proper.

LLC

THE LAW OFFICE OF AVRAM E.  
FRISCH LLC  
Attorneys for Defendant, Flemington Estates

  
By: \_\_\_\_\_

Avram E. Frisch, Esq.  
1 University Plaza, Suite 119  
Hackensack, NJ 07601  
201-289-5352  
frischa@avifrischlaw.com

Dated: June 18, 2025